

RUSS M. FUKANO (SBN 114166)  
 ERIC L. COMPERE (SBN 222038)  
 TROYGOULD PC  
 1801 Century Park East, 16th Floor  
 Los Angeles, California 90067-2367  
 Telephone: (310) 553-4441  
 Facsimile: (310) 201-4746  
 Email: rmfukano@troygould.com

Attorneys for Defendants Vericrest  
 Financial, Inc. and Mortgage Electronic  
 Registration Systems, Inc.

UNITED STATE DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

CATARINO MENDOZA,

Plaintiff,

v.

WILMINGTON FINANCE, a business entity,  
 form unknown; FIVE STAR INVESTMENT  
 AND REALTY; ACADEMY ESCROW, INC.,  
 a business entity, form unknown; NEW  
 CENTURY, business entity, form unknown;  
 NORTH AMERICAN TITLE COMPANY, a  
 business entity, form unknown; MORTGAGE  
 ELECTRONIC REGISTRATION SYSTEMS,  
 INC., a business entity, form unknown;  
 VERICREST FINANCIAL, a business entity,  
 form unknown, and DOES 1-100, inclusive,

Defendants.

Case No. 3:10-cv-05792-SC

STIPULATION TO FURTHER EXTEND  
 DEADLINE OF DEFENDANTS  
 VERICREST FINANCIAL, INC. AND  
 MORTGAGE ELECTRONIC  
 REGISTRATION SYSTEMS TO  
 RESPOND TO PLAINTIFF'S FIRST  
 AMENDED COMPLAINT

[Local Rule 6-1]

1 WHEREAS:

2 1. Plaintiff Catarino Mendoza ("Plaintiff"), on the one hand, and defendants  
3 Vericrest Financial, Inc. ("Vericrest") and Mortgage Electronic Registration Systems, Inc.  
4 ("MERS"), on the other hand, are exploring the possibility of resolution by means of a loan  
5 modification;

6 2. Pursuant to a previous stipulation approved by the Court, April 1, 2011 is the  
7 current deadline for defendants Vericrest and MERS to file and serve their respective responses  
8 to the first amended complaint ("FAC");

9 3. A case management conference ("CMC") was previously set in this matter for  
10 April 1, 2011;

11 4. The April 1, 2011 CMC was vacated by the Clerk's March 23, 2011 Notice of  
12 Pending Reassignment and the Court's March 23, 2011 Reassignment Order, which both state  
13 that all matters previously scheduled for hearing before Magistrate Judge Spero are vacated;

14 6. Plaintiff, on the one hand, and Vericrest and MERS, on the other hand, are  
15 discussing a potential loan modification, which could result in a settlement of this matter, and are  
16 engaged in the process of collecting and evaluating the information/documents relevant to a loan  
17 modification; and

18 7. Plaintiff, on the one hand, and Vericrest and MERS, on the other hand, agree that  
19 their discussions about potential resolution of this matter would be facilitated by a further  
20 extension of the deadline for Vericrest and MERS to respond to the first amended complaint.

21 **THEREFORE:**

22 In view of the foregoing, and pursuant to Local Rule 6-1, plaintiff Catarino Mendoza and  
23 defendants Vericrest and MERS hereby stipulate that the deadline for Vericrest and MERS to file  
24 and serve their respective responses to plaintiff's first amended complaint is extended, up to and  
25 including May 2, 2011.

1 Dated: March 25, 2011

RUSS M. FUKANO  
ERIC L. COMPERE  
TROYGOULD PC

2  
3  
4 /s/ Eric L. Compere  
5 By: Eric L. Compere  
6 Attorneys for Defendants Vericrest Financial,  
7 Inc. and Mortgage Electronic Registration  
8 Systems, Inc.

9 Dated: March 24, 2011

LEPERA & ASSOCIATES, PC.

10  
11 By: /s/ Joseph A. Lepera  
12 Joseph A. Lepera  
13 Attorneys for Plaintiff Catarino Mendoza



**ATTESTATION PURSUANT TO GENERAL ORDER NO. 45**

Pursuant to General Order No. 45 of the Northern District of California, I attest that concurrence in the filing of the document has been obtained from each of the other signatories to this document.

By: /s/ Eric L. Compere